WHEELER RIDGE-MARICOPA WATER STORAGE DISTRICT

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September 6, 2011

by email - to Fethi Benjemaa at jemaa@water.ca.gov

Fethi Benjemma
California Department of Water Resources
901 P Street, Suite 313 A
Sacramento, CA 95814

Subject: Comments on Proposed Regulation §597 - Agricultural Water Measurement Under Title 23, Div. 2, Ch. 5.1, Article 2.

Dear Mr. Benjemma:

Wheeler Ridge-Maricopa Water Storage District (District) is a public agency and Member Unit of the Kern County Water Agency, and relies on the State Water Project for its primary water supply. It delivers irrigation water under water service contracts to 72,074 acres of farm lands in Kern County, and can provide such water for up to an additional 18,000 acres of farm lands when water supplies are sufficient. It operates and maintains nearly 300 miles of pipelines, 137 booster pumps, 18 water wells, over 700 water meters and 7 miles of concrete-lined canal. The District has been 100% metered for both water supplies and deliveries to its agricultural customers since it commenced water deliveries in 1971. In addition to supplying irrigation water to farms, the District manages local groundwater and participates in three groundwater banking projects to supplement State Water Project supplies.

As a general principle, and independent of the proposed regulation, the District maintains that existing vested economic interests already ensure an effective oversight mechanism for validating water measurement accuracy. The District's customers pay the District for every acre-foot delivered to them, so individual customers have a vested interest to ensure the meter does not register more water than is actually delivered. Conversely, because the District's revenue comes from volumetric sales to customers, the District has a vested interest to ensure the meter does not register less than is actually delivered. Dedicated District staff monitor water deliveries on a daily basis and are sensitive to circumstances that could indicate under-metering e.g. flow rates less than historic or ordered flows. Our customers are equally sensitive to circumstances that could indicate over-metering, e.g. more water metered than the customers' water orders. Furthermore, the District allows its customers to question the accuracy of a metered turnout at any time with the understanding that the District will pay an independent calibration test if the meter is out of compliance, and the customer will pay those costs if the accuracy of the meter is within the manufacturer's specifications.

In general, the District supports the development of guidelines for implementation of locally cost-effective agricultural water measurement. The District hereby submits comments on the Proposed Regulation, and recommends changes described below. Please note that these comments are based upon the Revised

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Agricultural Water Measurement Regulation adopted July 5, 2011.

Section §597.4(a). This section requires clarification. The District operates and maintains over 700 propeller type meters to serve 90,000 acres of irrigated farm lands. At the time of installation, all of these met the requirements of §597.3(a)(2)(A). Since these meters are used for volumetric billing of water to its customers, the District has an active monitoring, repair, replacement and accuracy verification program. The accuracy verification is implemented by comparing the District's aggregate metering records to upstream metering conducted by DWR (using venturi rather than propeller meters - a different device type). Such comparisons are made monthly and consistently show values within the metering accuracy standards described in §597.3(a). Such comparisons effectively test 100% of the District meters in use in a given month (rather than 10% of meters over a year). This achieves a much higher standard than contemplated in §597.3(a). Therefore, the District has an effective accuracy verification system already in place that far exceeds the intent of §597.4(a)(1). However, it could be argued that because the District does not perform individual field meter tests as suggested in §597.4(a)(1), it would not comply with said section. Therefore, an additional paragraph (C) should be added to §597.4(a)(1), and read as follows *(added language in italics)*:

> "*§597.4(a)(1)(C) Field testing wherein the aggregate accuracy of multiple devices can be verified via comparison with a set of upstream or downstream devices may be used to identify compliance provided that all farm gates within the reach being evaluated are metered.*"

It is also noted that the District's situation with respect to dual metering is not universal. The fact the District can meet a higher standard than proposed in the regulation should not set any precedent for what that standard should be. The appropriate standard is critically dependent on various factors including whether the standard is locally cost-effective. The District supports the standard in California Water Code §531.10 (b) which should be included or referenced in the proposed regulation: *"Nothing in this article shall be construed to require the implementation of water measurement programs that are not locally cost effective."*

Conclusion. The Department should revise the proposed regulation in accordance with the comments, and for the reasons stated, above.

If questions arise, please call me at extension 13.

Sincerely,

Sheridan G. Nicholas, P.E.
Water Resources Manager

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